

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Caroline Gan
Title: Director - Wholesale

REQUEST: Joint Parties' First Set of Discovery

DATED: December 23, 2003

ITEM: Joint Parties 1-1 For each Verizon wire center in Massachusetts, please provide on a monthly basis the number of loops, by type listed below, in electronic spreadsheet form (i.e., as an Excel Spreadsheet), provisioned to CLECs in each of the past 12 months:

- a. UNE analog loop (residential);
- b. UNE analog loop (business);
- c. UNE DS-1 loop;
- d. Analog special access;
- e. DS-1 special access;
- f. UNE-P (residential);
- g. UNE-P (business);
- h. ADSL loop (residential);
- i. ADSL loop (business);
- j. DS-3 loop;
- k. Other.

REPLY: Verizon MA objects to this request to the extent that it is overbroad, unduly burdensome and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, neither special access nor xDSL loops have any relevance to the trigger analysis. Notwithstanding these objections, Verizon MA responds as follows

Verizon MA has the following data available in response to this request.

a. Please see the Attachment Joint Parties 1-1 a,b,f,g for the

ITEM: Joint Parties 1-1

REPLY: Cont'd

number of lines on new UNE loop orders provisioned to CLECs, on a statewide basis for Massachusetts for December 2002 to November 2003. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

- b. Please see the response to part a.
- c. Please see Attachment Joint Parties 1-1 c,h,i,j for the number of UNE DS1 loop orders provisioned to CLECs, on a statewide basis for Massachusetts for December 2002 to November 2003. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.
- d. Please see Attachment Joint Parties 1-1 d,e for the number of Analog Special Access lines provisioned to CLECS, on a statewide basis for Massachusetts for December 2002 to November 2003. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.
- e. Please see Attachment Joint Parties 1-1 d,e for the number of DS-1 Special Access lines provisioned to CLECS, on a statewide basis for Massachusetts for December 2002 to November 2003. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.
- f. Please see Attachment Joint Parties 1-1 a,b,f,g for the number of lines on new UNE Platform orders provisioned to CLECs, on a statewide basis for Massachusetts for December 2002 to November 2003. The attachment contains proprietary information and is being provided to the Department and to parties in accordance with the terms of the Department's Protective Order.

ITEM: Joint Parties 1-1

REPLY: Cont'd

- g. Please see the response to part f.
- h. Please see Attachment Joint Parties 1- 1 c,h,i,j for the number of lines on xDSL loop orders provisioned to CLECs, on a statewide basis for Massachusetts, for December 2002 to November 2003.
- i. Please see the response to part h.
- j. Please see Attachment Joint Parties 1 – 1 c,h,i,j for the number of UNE DS3 loop orders provisioned to CLECs, on a statewide basis for Massachusetts for December 2002 to November 2003.
- k. Data not available.